

# EXHIBIT G



Deposition of:  
**Confidential AEO Brandi Edmondson**  
*November 13, 2020*

In the Matter of:  
**In Re: Capital One Consumer Data  
Security Breach L**

Veritext Legal Solutions  
800.808.4958 | [calendar-atl@veritext.com](mailto:calendar-atl@veritext.com) | 770.343.9696

In Re: Capital One Consumer Data Security Breach L

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1 Q. (BY MR. HUBBARD) Do you know if your  
2 personal information was compromised in the E-bay  
3 data breach, in May of 2014?

4 A. I -- I don't believe so, no.

5 Q. Do you ever buy anything on E-bay?

6 A. No, not that I recall.

7 Q. And are you aware if any of your personal  
8 information was compromised in the Target data  
9 breach in December of 2013?

10 A. No, I don't. Huh-uh, I don't recall.

11 Q. Do you know anything about the person  
12 responsible for the data breach that occurred at  
13 Capital One?

14 A. No, sir.

15 Q. You don't know how she committed the data  
16 breach?

17 A. No, no.

18 Q. Are you aware that she was arrested by the  
19 FBI in late July of 2019, and has been indicted?

20 A. No.

21 Q. Are you aware that the FBI seized her  
22 computers and other devices?

23 A. No.

24 Q. Are you aware that she has stated that she  
25 did not share the information she stole from

1 Capital One with anyone else?

2 MS. BERG: Object to the form.

3 A. No.

4 Q. (BY MR. HUBBARD) With that information, do  
5 you believe that you could still be subject to  
6 future identity theft, since the government is in  
7 possession of the data stolen from Capital One?

8 MS. BERG: Object to the form of the  
9 question.

10 A. So -- yes.

11 Q. (BY MR. HUBBARD) Do you believe it's still  
12 a possibility?

13 A. Correct, sir.

14 Q. And what do you base that belief on?

15 A. I don't recall what information was used or  
16 compromised, so it could be anything. The smallest  
17 or the littlest of any of mine -- or any of the  
18 clients' information, the consumer's information.

19 Q. So you believe that there's a possibility  
20 that you could suffer some sort of future identity  
21 theft as a result of the Capital One data breach,  
22 right?

23 A. Yes, sir.

24 Q. But you don't know?

25 A. I don't have -- yes, I don't have any way of

1 knowing that.

2 Q. Ms. Edmonson, have you ever been a  
3 plaintiff, a named plaintiff, in a class action  
4 lawsuit before?

5 A. No, sir.

6 Q. You have submitted claims to recover  
7 benefits from class action lawsuits in the past,  
8 correct?

9 A. Correct.

10 Q. And I think you provided some testimony  
11 about us -- to us, about some previous claims that  
12 you submitted in data breach class actions, right?

13 MS. BERG: Object to the form.

14 A. I believe so.

15 Q. (BY MR. HUBBARD) Well, you submitted at  
16 least -- you submitted claims in at least the  
17 Equifax data breach and the solar data breach,  
18 correct?

19 MS. BERG: Object to the form.

20 A. Correct.

21 Q. (BY MR. HUBBARD) You submitted claims to  
22 recover settlement benefits in class actions  
23 unrelated to data breaches.

24 Is that right?

25 A. It's possible.

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CHANGES AND SIGNATURE

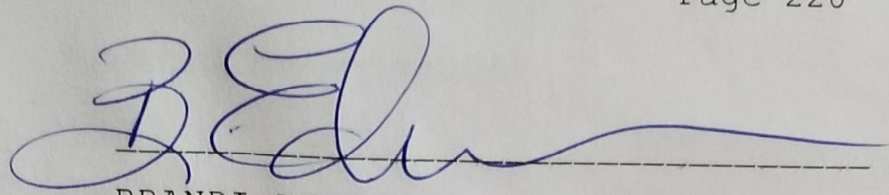
WITNESS NAME: BRANDI EDMONSON

DATE OF DEPOSITION: NOVEMBER 13, 2020

My last name Edmondson is misspelled as Edmonson  
throughout the transcript.

No other changes to the transcript are needed.



  
BRANDI ~~EDMONSON~~  
EDMONDSON

THE STATE OF TEXAS     )  
SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned  
authority, by the said BRANDI EDMONSON on this the  
\_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
Notary Public in and for  
the State of Texas

My Commission Expires: \_\_\_\_\_